

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

| | | |
|---|---|---------------------|
| STATE OF TEXAS, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No. 1:18-CV-68 |
| |) | |
| UNITED STATES OF AMERICA, <i>et al.</i> , |) | |
| |) | |
| Defendants, |) | |
| |) | |
| KARLA PEREZ, <i>et al.</i> , |) | |
| |) | |
| Defendant-Intervenors, |) | |
| and |) | |
| |) | |
| STATE OF NEW JERSEY, |) | |
| |) | |
| Defendant-Intervenor. |) | |
| |) | |

DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO EXCEED PAGE LIMITS

Defendant-Intervenor State of New Jersey (“New Jersey”) respectfully requests that the Court grant it permission to exceed the 20-page limit for memoranda of law by up to 15 extra pages for its Reply Memorandum of Law in Opposition to Plaintiffs’ Motion for Preliminary Injunction. New Jersey’s Reply Memorandum of Law will address many of the complex issues raised in the previously submitted (enlarged) briefs of the opposing parties in this case of national importance, and New Jersey requires these extra pages to adequately present these issues to the Court for adjudication. New Jersey seeks this extension for good cause and in the interest of justice, and no party will be prejudiced if the motion is granted.

CONCLUSION

New Jersey respectfully requests that the Court grant this Motion to Exceed Page Limits.

Dated: August 3, 2018

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Rachel Wainer Apter
Assistant Attorney General
Attorney-in-Charge
(admitted pro hac vice)
Richard J. Hughes Justice Complex
25 Market Street, 8th Floor
Trenton, New Jersey 08625-0116
Phone: (609) 376-2702
Fax: (609) 777-4015
Rachel.Apter@njoag.gov

Jeremy Hollander, Assistant Attorney General
(admitted pro hac vice)
Kenneth S. Levine, Deputy Attorney General
(admitted pro hac vice)
Paul H. Juzdan, Deputy Attorney General
(admitted pro hac vice)
Katherine Gregory, Deputy Attorney General
(admitted pro hac vice)
Nicholas Dolinsky, Deputy Attorney General
(admitted pro hac vice)
Brian DeVito, Deputy Attorney General
(admitted pro hac vice)
Office of the Attorney General
124 Halsey Street, 5th Floor
Newark, NJ 07101

Attorneys for Defendant-Intervenor State of New Jersey

CERTIFICATE OF CONFERENCE

I certify that counsel for Plaintiffs, Federal Defendants and the Perez Defendant-Intervenors have each indicated that they do not oppose this request for up to 35 pages.

/s/Rachel Wainer Apter

Rachel Wainer Apter

CERTIFICATE OF SERVICE

I certify that on August 3, 2018, I caused this document (and exhibits hereto) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Rachel Wainer Apter

Rachel Wainer Apter